

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-2(c)

Brenner, Spiller & Archer
125 Rt. 73 N.
West Berlin, NJ 08091
P: 856-963-5000
F: 856-858-4371
Attorney for Debtor

In Re:

Sharon Roman

Case No.: 22-12963

Judge: ABA

Chapter: 13

NOTICE OF MOTION TO EXPUNGE OR REDUCE PROOF OF CLAIM

To: Isabel Balboa
Chapter 13 Standing Trustee
Cherry Tree Corporate Center
535 Rt 38 – Suite 580
Cherry Hill, NJ 08002

Planet Home Lending, LLC
Attn: Officer, Manager, Agent
321 Research Parkway, Suite 303
Meriden, CT 06450

Friedman Vartolo, LLP
Attn: Jonathan Schwalb, Esq.
1325 Franklin Avenue, Suite 160
Garden City, NY 11530

PLEASE TAKE NOTICE, that the undersigned attorney for Debtor, shall make application to this Honorable Court Objecting to the Proof of Claim #12.

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely upon the attached Certification of Andrew Archer, Esq., attorney for debtor, the arguments of counsel and such other and further proofs as may be adduced at the hearing hereof.

PLEASE TAKE FURTHER NOTICE that the moving party believes that no brief is necessary in support of the within application due to the fact that the matter involves no complex issues of law or fact.

PLEASE TAKE FURTHER NOTICE that if you wish to contest the within Motion, you must file opposition with the office of the Clerk of the Bankruptcy Court, and serve the undersigned 7 days in advance of the aforesaid hearing, your responding papers stating with particularity the basis of your opposition to the within motion. A copy of the proposed Order which is sought is enclosed with this motion.

Dated: December 5, 2022

/s/ Andrew Archer
Andrew Archer, Esquire
Attorney for Debtor